

UNITED STATES DISTRICT COURT

DISTRICT OF MASSACHUSETTS

UNITED STATES OF AMERICA )

)

v. )

M.B.D. Case No. 20-mj-01441-DLC

)

JACKELINE PEÑA-AQUINO, )

Defendant )

FILED UNDER SEAL

MOTION TO WAIVE PROBABLE CAUSE HEARING AND WITHDRAW AS COUNSEL

Now comes the defendant, JACKELINE PEÑA-AQUINO and notifies the Court that the defendant wishes to waive her right to a probable cause hearing in this matter. In addition, the parties have been engaged in preliminary discussions regarding the possible resolution of this matter and have agreed to, and the Court has entered an extension of the time for Indictment until April 28, 2021.

The defendant and her counsel believe that it is in the defendant's best interest that further discussions concerning a potential resolution be done by new counsel. Therefore, Attorney Apostle prays the court to allow his withdrawal and to appoint appropriate counsel for MS. PEÑA-AQUINO.

Respectfully submitted,

JACKELINE PENA-AQUINO

By her attorney,

/s/ CARLOS A. APOSTLE

CARLOS A. APOSTLE, ESQUIRE

Certificate of Service

I hereby certify that this document filed through the ECF system will be sent electronically to the registered participants as identified on the Notice of Electronic Filing and paper copies will be sent to those indicated as non-registered participants.

By: /s/ Carlos A. Apostle, Esquire